

## **Remarks**

Reconsideration of this application is respectfully requested.

### **Claims 27-30 are patentable over Hoarty, even when considered in combination with Addington and/or Brodigan**

Independent claim 27 is directed to a broadband multimedia system having a broadband multimedia router that is communicatively connected to a data router ... and a *session manager ... configured to provide routing instructions to said broadband multimedia router for ... (ii) directing addressable data packets received from said data router to at least a selected one of said network transmitters* for transmitting over said broadband network to a specific destination associated with address information included in said addressable data packets. By way of clarification, Applicants' specification, at page 17, line 29, states:

A data packet received from Ethernet module 176, is typically an addressable packet and hence already contains destination information. This data packet can be directed to a respective output port of the switch, according to that destination information. It is noted that session manager and IP soft-switch unit 102 can instruct broadband multimedia router 116, for example, by means of a routing table, to direct addressable packets to predetermined ports, which are set to be different but according to the destination information embedded in the packet.

In the Office Action, the Examiner suggests that this limitation is disclosed by Hoarty. Specifically, the Examiner suggests that Applicants' session manager is disclosed by, or equivalent to, the "System Manager" with reference number 113 in Figure 1 of the Hoarty reference. Similarly, the Examiner suggests that Applicants' data router is disclosed by, or equivalent to, the "personal multimedia modules" (PMMs) with reference number 122 in Figure 1 of Hoarty. Applicants respectfully disagree.

First, according to Applicants' claim 27, the broadband multimedia router receives data from the connected data router, and the multimedia router routes such data based on routing instructions received from the session manager. This is not disclosed or suggested by Hoarty. As illustrated in Figure 1 of Hoarty, the personal multimedia

modules (PMM) with reference number 122 receive data from switch 121 (the PMMs are shown to be downstream of the switch 121, as indicated by the direction of the arrow).

The switch 121 of Hoarty does not receive data from the PMMs. To the contrary, at line 55 of column 5, Hoarty states:

In front end 12, information content is switched via switch 121 to a plurality of personal multimedia modules (PMMs) 122, usage of which is allocated on a demand basis.

Therefore, the switch does not receive data from the PMMs, and the PMMs are not equivalent to Applicants' data router. Moreover, the switch with reference number 121 does not route addressable data received from the PMMs, according to routing instructions received from the System Manager 113. Quite simply, Hoarty does not disclose the above limitation of claim 1. Stated otherwise, Hoarty does not disclose or suggest a broadband multimedia router that is communicatively connected to a data router ... and a *session manager ... configured to provide routing instructions to said broadband multimedia router for ... (ii) directing addressable data packets received from said data router to at least a selected one of said network transmitters* for transmitting over said broadband network to a specific destination associated with address information included in said addressable data packets, as is claimed by Applicants.

Furthermore, independent claim 27 is directed to a broadband multimedia system having a broadband multimedia router that is *configured to encapsulate packets of media streams* received from said media sources *within addressable packets for switching between inputs and outputs of the broadband multimedia router*. By way of clarification, Applicants' specification states:

... It is noted that a conventional MPEG transport stream does not include routing information such as destination or origin, rather just limited identification information, known as PID (Packet Identification).

In the present example, core switch 174 is a generic packet switching device and hence *every packet provided thereto, has to be in a known addressable packet format*. With respect to the media streams received at DVB/ASI-IN module 172, broadband multimedia router 116 encapsulates a packet of media stream in an addressable packet, with

destination information respective of the switch port, connected to DVB/ASI-OUT module 170 and its original stream PID 50. (*emphasis added*)

(Applicants' Specification; Page 11, Lines 8-11; and Page 16, Lines 11-17).

From Applicants' specification, it is clear that an addressable packet is a packet that includes an address (or address field) identifying a destination and/or origin, which can be used by a packet switching device to route the addressable packet.

In the Office Action, the Examiner states that the above limitation is not disclosed by Hoarty, but by Addington. The title of the Addington reference is: "Method for Delivery of IP Data over MPEG-2 Transport Network". As such, Addington discloses a method for encapsulating IP data (e.g., addressable packets) within MPEG packets (non-addressable packets). In the Office Action, the Examiner concludes that an MPEG packet must be an addressable packet. Specifically, the Examiner states:

... In addition, it is noted that each MPEG transport packet contains an address field, referred to as a program identifier (PID), which uniquely identifies the service carried by the packet according to MPEG standard. Therefore, MPEG packets must be addressable packets.

The Examiner states that a program identifier (PID) is an address field.

Applicants contend that a PID, as its name suggests, is a program identifier field, not an address field. As the Examiner points out, a PID indicates or identifies the service carried by the packet. However, a PID is not an address, and it does not identify or indicate the address of a destination. Importantly, a conventional packet switching engine cannot route an MPEG packet by using only its PID. Therefore, an MPEG packet, as described by Addington, is not an addressable packet, as claimed. Stated otherwise, Addington does not disclose *encapsulating packets of media streams within addressable packets*.

Furthermore, according to Addington, the IP packets are encapsulated within the MPEG transport packets so that the IP packets will be included in the MPEG transport stream of the designated downstream route. That is, the IP packets are encapsulated within the MPEG packets so that a subscriber device downstream will receive the IP packets. Addington does not disclose or suggest encapsulating packets of media streams

within addressable packets *for switching between inputs and outputs of a broadband multimedia router.*

For at least the reasons set out above, dependent claims 28-30 are patentable over the cited references. Accordingly, Applicants submit that the rejections of the previous Final Office Action should be withdrawn. If there are any additional fees due in connection with this communication, please charge our deposit account no. 19-3140.

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